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December 18, 2015

RECEIVED  
FEDERAL ELECTION  
COMMISSION

2016 JAN 4 PM 2:51

FAX (901) 328-1803  
OFFICE OF CLERK

To General Counsel , Federal Election Commission  
999 E. Street NW Washington D.C.

Re: MUR #6861

Dear Sir or Madame;

I am an attorney in Memphis, Tennessee . I write on behalf of M. Latroy Williams (Mr. Williams) with regard to the above-referenced claim #6861. Mr. Williams operates a series of limited liability companies in Shelby County, Tennessee, functioning mainly as local political clubs. These political clubs work closely with candidates at all levels of the local elections for judgeships, congressional seats, court clerk, county commissioners city council and others to develop support for the candidates and their platforms . The clubs are all properly incorporated pursuant to Tennessee state incorporations statutes and function during the election season as a source of information about the candidates. A plethora of Shelby County organizations, including the Cohen campaign, produce a ballot to disseminate information about the candidates for local elections and to vocalize their support for one or several of these candidates. As noted above, Mr. Williams operates the

Shelby County Democratic Club, The Shelby county Democratic Party, The Memphis Democratic club and the National Democratic Party of the U.S.A .He issues ballots for these organizations. During the election cycle, along with his ballots, a participant in Shelby county elections would find a ballot similar to Mr. Williams ballots from the Former Democratic Party chairmen's Ballot (Exhibit 1) A ballot from the Republican Party of Shelby county(Exhibit 2)Congressman Cohen's Democratic Ballot (Exhibit 3) The Official Shelby County Coalition of Democrat's ballot(Exhibit 4) The Memphis AFL-CIO Labor Council Official Ballot (Exhibit 5) The National Bar Association Ben Jones chapter official Judicial Ballot (Exhibit 6). . Mr. Cohen himself produces a ballot that urges the resident to ask for a Democratic ballot, whatever that is. (Exhibit 7). Then there is the Harold ford Sr.(former congressman prior to Mr Cohen) Election Day Ballot for the Federal and State Republican and Democratic Primary Election and the Shelby county General Election Shelby County Tennessee (Exhibit 8) Next there is the Official Shelby County coalition of Democrats Ballot (Exhibit 9). Finally there is the Official Ballot of the Greater Memphis Democratic club, Inc. (Exhibit 10) Each one purports to be the official ballot .To single out Mr. Williams out of the multitude of ballots floating around Shelby County at election time is unfair and inexplicable. Moreover Mr. Williams in none of the four organizations that he controls, ever associates himself with nor does he mention the Democratic National Committee. Mr. Williams never labels himself the "official" anything. We believe these malicious accusations of fraudulent activity to be an effort to eliminate political opposition and an abuse of the Federal Election Commission. In a heated political contest, fear of losing does not justify unfounded allegations of fraud and the abuse of

official administrative agencies for political gain. We believe these allegations of fraud to be an effort to use the Federal Election Commission in a political maneuver to eliminate competing political speech, speech which our supreme court has said is to be afforded the highest levels of protection. . The court noted in Eu v. San Francisco County Democratic Cent. Comm., 489 U.S. 214, 223, 109 S. Ct. 1013, 1020, 103 L. Ed. 2d 271, 282, 1989 U.S. LEXIS 1042, \*18-19, 57 U.S.L.W. 4251 (U.S. 1989)" We have recognized repeatedly that "debate on the qualifications of candidates [is] integral to the operation of the system of government established by our Constitution." Buckley v. Valeo, 424 U.S. 1, 14 (1976) (*per curiam*); see also NAACP v. Claiborne Hardware Co., 458 U.S. 886, 913 (1982); Carey v. Brown, 447 U.S. 455, 467 (1980); Garrison v. Louisiana, 379 U.S. 64, 74-75 (1964). Indeed, the First Amendment "has its fullest and most urgent application" to speech uttered during a campaign for political office. Monitor Patriot Co. v. Roy, 401 U.S. 265, 272 (1971); see also Mills v. Alabama, 384 U.S. 214, 218 (1966). Free discussion about candidates for public office is no less critical before a primary than before a general election. Cf. Storer v. Brown, 415 U.S. 724, 735 (1974); Smith v. Allwright, 321 U.S. 649, 666 (1944); United States v. Classic, 313 U.S. 299, 314 (1941). In both instances, the "election campaign is a means of disseminating ideas as well as attaining political office." Illinois Bd. of Elections, supra, at 186. The accusation that Mr. Williams is misleading anyone is patently false. As noted above, none of Mr. Williams' literature mentions the Democratic National committee, nor does Mr. Williams ever designate his ballot as the "official ballot" while many of the other ballots distributed wholesale during Shelby County elections freely

100-44747-102

Sincerely,  
  
Paul Robinson Jr.

**Paul Robinson Jr.**

# EXHIBIT /

## FORMER DEMOCRATIC PARTY CHAIRMEN'S BALLOT

### PLEASE VOTE TO RETAIN ALL SUPREME COURT & APPELLATE COURT JUSTICES

Dear Shelby County Voter,

We (Van and David) were prompted to put this sample ballot together for the benefit of several judges who we think are deserving of your vote. There are so many names on the election ballot this year it is easy to overlook good people who will be making important decisions in the lives of our citizens. While we are both former Shelby County Democratic Chairmen and our recommendations are affected by our party affiliation, we thought it was important to promote candidates, whether or not they had a background as Democrats or Republicans or Independents.

The judiciary races are non-partisan and, at the local level, have little ideological importance. What is important is competence, demeanor, and compassion, and these judges and judge candidates meet that test and more. We are both practicing lawyers and we know the importance of good judges for our clients and for the public welfare, and we do not think it is appropriate to try to use their elections for partisan gain. Thank you for your consideration and be sure to vote



DAVID COCKE



VAN TURNER



KATHLEEN H. GOMES  
Probate Court Judge, Division 1



JOHN DONALD  
General Sessions Court Judge, Division 3



MARK WARD  
Criminal Court Judge, Division 9



BILL ANDERSON, JR.  
General Sessions Court Judge, Division 7



PHYLLIS B. GARDNER  
General Sessions Court Judge, Division 2



RHYETTE NORTHCROSS HURD  
Circuit Court Judge, Division 5



WALTER EVANS  
Chancery Court Judge, Chancellor Part 1



JIM KYLE  
Chancery Court Judge, Chancellor Part 2



DANNY KAIL  
Probate Court Judge, Division 2



D'ARMY BAILEY  
Circuit Court Judge, Division 3



LARRY POTTER  
General Sessions Court Judge, Division 14



TIM J. DWYER  
General Sessions Court Judge, Division 8



GWEN HOOKS  
General Sessions Court Judge, Division 12



TARIK SUGARMAN  
Juvenile Court Judge

# Republican Sample Ballot

**ON AUGUST 7**  
**CAST YOUR VOTE FOR**  
**SERIOUS**  
**LEADERSHIP**

EXHIBIT **2**

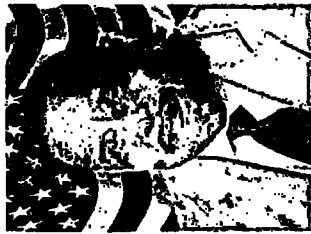
- ★ Conservative Principles
- ★ Individual Empowerment
- ★ Honest Government
- ★ Accountability and Results
- ★ Safer Neighborhoods and Schools

**Why wait? Vote Early!**

Early vote July 18 - Aug 2  
See locations, details inside



Regina Morrison Newman  
Shelby County Trustee



Randy Wade  
Shelby County Sheriff



Steve Cohen  
United States Congress



Minerva Johnica  
Criminal Court Clerk



Steve Mulroy  
Shelby County Commission

# CONGRESSMAN COHEN

## DEMOCRATIC BALLOT

## DEMOCRATIC PRIMARY

GOVERNOR  
Vote for One: (1)

☒

MIKE MCWHERTER

☐

UNITED STATES HOUSE OF  
REPRESENTATIVES  
9TH CONGRESSIONAL DISTRICT  
Vote for One: (1)

☒

STEVE COHEN

☐

WILLIE W. HERNTON

## SHELBY COUNTY GENERAL ELECTION

SHELBY COUNTY MAYOR  
Vote for One: (1)

☐
☒

JOE FORD  
(DEMOCRATIC NOMINEE)

SHELBY COUNTY SHERIFF  
Vote for One: (1)

☐
☒

BILL OLDHAM  
(REPUBLICAN NOMINEE)  
RANDY WADE  
(DEMOCRATIC NOMINEE)

EXHIBIT

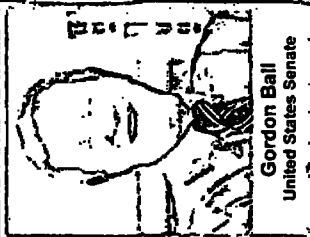
3

# THE OFFICIAL SHELBY COUNTY COALITION OF DEMOCRATS BALLOT

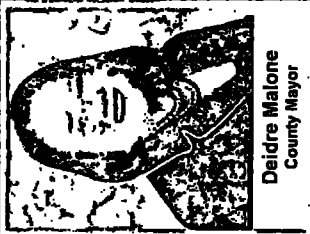
Circulation Shelby County Wide 150,000

EXHIBIT

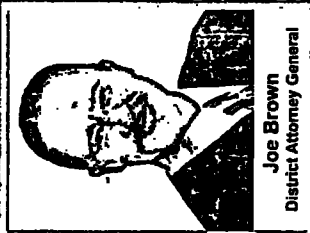
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**Gordon Ball**  
United States Senate



**Deidre Malone**  
County Mayor



**Joe Brown**  
District Attorney General



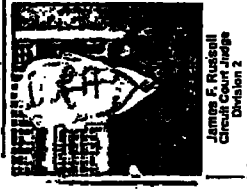
**Ricky Dixon**  
Tennessee Senate  
28th Senatorial District



**Allison Brewster**  
State Representative  
District 33



**Felicit Corbin-Johnson**  
Circuit Court Judge  
Division 1



**James F. Russell**  
Circuit Court Judge  
Division 2



**D'Army Bailey**  
Circuit Court Judge  
Division 3



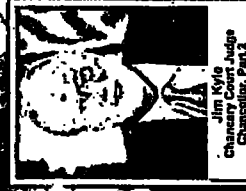
**Gina Carol Higgins**  
Circuit Court Judge  
Division 4



**Verita Martin Andrews**  
Circuit Court Judge  
Division 6



**Walter L. Evans**  
Chancery Court Judge  
Chancellor, Part 1



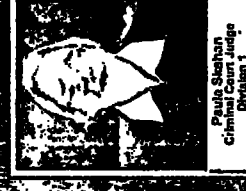
**Jim Kyle**  
Chancery Court Judge  
Chancellor, Part 2



**Kathleen N. Gennies**  
Probate Court Judge  
Division 1



**Karen D. Webster**  
Probate Court Judge  
Division 2



**Paula Sheehan**  
Criminal Court Judge  
Division 1



**Lohanya Sue Burrow**  
Criminal Court Judge  
Division 3



**Rebecca T. Ross**  
Criminal Court Judge  
Division 5



**Alicia Howard**  
Criminal Court Judge  
Division 6



**Mark Ward**  
Criminal Court Judge  
Division 8



**Chayenne Johnson**  
Assessor of Property



**Lynn Cobb**  
General Sessions Court Judge  
Division 1



**David L. Pool**  
General Sessions Court Judge  
Division 3



Memphis City Election Thursday, October 6, 2011.

"Our Voice, Our Vote, Our Community"

## The Memphis AFL-CIO Labor Council Official Ballot

(Labor Unions in Memphis, endorses the following candidates)



☒ **VOTE**

**Edmund Ford Sr.**  
for Memphis Mayor

"A Man you can trust"



☒ **VOTE**

**Joe Brown**  
for City Council  
District 8 Pos. 1

"A Man who walks with  
the people"



☒ **Vote Kendrick Sneed** for City Council District 1

Kendrick Sneed is a uniformed Shelby County Sheriff's Deputy who regularly patrols District 1. He has been keeping the residents of Memphis safe from crime and identifies with the needs of the people of Memphis. He will be hard on crime. He will be the first ever law enforcement person elected to the City Council.



☒ **Vote Wanda Halbert** for City Council District 4

Wanda Halbert was elected to the Memphis City Council in 2007. She has fought to ensure that the Citizens of Memphis are cared for. She is a candidate who has taken on the special interest groups and has consistently fought to ensure that the future of Memphis is brighter for all Memphians.



☒ **Vote Edmund Ford Jr.** for City Council District 6

Edmund Ford Jr. is currently the Councilman for District 6. He is a teacher in the Memphis City Schools and has worked hard in District 6. He has fought consistently for the children of Memphis and pledges to continue that fight. He has also voted to help keep crime down and taxes low and will continue to do so.



☒ **Vote Janis Fullilove** for City Council District 8 Position 2

Janis Fullilove currently serves as the Councilwoman for District 8, Pos. 2. She has fought to reduce crime and improve life for all Memphians. She will fight to support teachers, police, fire fighters, sanitation workers, MLGW and other workers. She has pledged to continue the fight for the education of our children and will push for the creation of jobs to ensure that all Memphians have a brighter future. "SPEAKING OUT - STANDING STRONG - FIGHTING FOR YOU"



☒ **Vote Paul Shaffer** for City Council District 9 Position 1

Paul Shaffer has proven to be a strong advocate for all workers, keeping jobs in the City of Memphis and is against any outsourcing of jobs. He will work to ensure our economy grows and pledges to keep money in the City of Memphis budget where it needs to be. Paul Shaffer is for helping Memphians and "NOT" giving your money away to special interest groups as his opponent Kemp Conrad does.

Early Voting begins Friday, Sep. 16<sup>th</sup> thru Saturday, Oct. 1<sup>st</sup>  
Election Day Thursday, Oct. 6, 2011

**Working People supporting Working People**

EXHIBIT

5

**NATIONAL BAR ASSOCIATION**  
**BEN F. JONES CHAPTER**

**OFFICIAL JUDICIAL**  
**BALLOT**

**AUGUST 5, 2010**

PD POL AD BY THE CANDIDATES' COMMITTEES & THE BEN F. JONES CHAPTER, NBA

EXHIBIT

6

EXHIBIT

7

DEMOCRATIC PRIMARY - AUGUST 7  
EARLY VOTING - JULY 18- AUGUST 2

ASK FOR A  
Call 901-323-



"Congressman Steve Cohen has been a leader on justice and civil rights issues and has worked tirelessly on behalf of his constituents. His focus on bringing good jobs, affordable health care, and world class education to Tennessee is why I am proud to once again support his re-election."

- President Barack Obama



KEEP GOIN' WITH  
**COHEN**  
CONGRESS

2622 Poplar Ave.  
Memphis, TN 38112

6 7

Marinda L. Wil  
Or Current Resi  
3693 Hermitage  
Memphis TN 38

EXHIBIT

8

THE OFFICIAL

HAROLD  
FORD  
-SR-

ELECTION DAY BALLOT

ORDER OF THE BALLOT IS SPECIFIED BY TENNESSEE CODE ANNOTATED 2-5-208

FEDERAL AND STATE  
REPUBLICAN AND DEMOCRATIC PRIMARY ELECTION  
AND SHELBY COUNTY GENERAL ELECTION  
SHELBY COUNTY, TENNESSEE  
AUGUST 7, 2014

GOVERNOR



BILL HASLAM

UNITED STATES SENATE



TAMMIE ALLEN

STATE EXECUTIVE

COMMITTEEMAN

29th SENATORIAL DISTRICT



TERRY ROLAND

CIRCUIT COURT JUDGE

DIVISION VIII



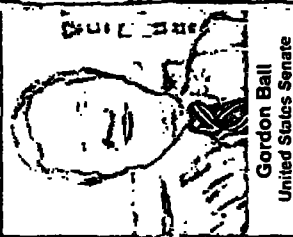
CRIMINAL COURT JUDGE

DIVISION III



# THE OFFICIAL SHELBY COUNTY COALITION OF DEMOCRATS BAL EXHIBIT

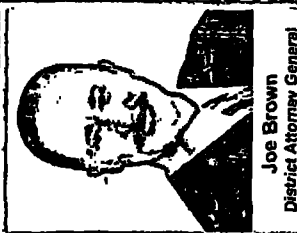
Circulation Shelby County Wide: 150,000



Gordon Ball  
United States Senate



Deidre Malone  
County Mayor



Joe Brown  
District Attorney General



Ricky Dixon  
Tennessee Senate  
29th Senatorial District



Allison Brownlee  
State Executive Commissioner  
District 23



Felicia Corbin-Johnson  
Circuit Court Judge  
Division 1



James F. Rutanell  
Circuit Court Judge  
Division 2



D'Army Bailey  
Circuit Court Judge  
Division 3



Gina Carol Higgins  
Circuit Court Judge  
Division 4



Vontia Martin Andrews  
Circuit Court Judge  
Division 5



Walter L. Evans  
Chancellor, Part 1  
Chancellor



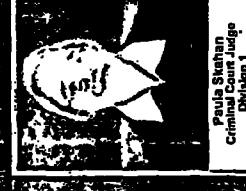
Jim Kyle  
Chancellor, Part 2  
Chancellor



Kathleen N. Gomez  
Prosecutor  
Division 1



Karen D. Webster  
Prosecutor  
Division 2



Paul Stathan  
Criminal Judge  
Division 1



Leandra Sue Burrow  
Criminal Judge  
Division 3



Mozella T. Ross  
Criminal Court Judge  
Division 5



Alicia Howard  
Criminal Court Judge  
Division 6



Mark Ward  
Criminal Court Judge  
Division 6



Chrystine Johnson  
Assessor of Property



Lynn Cobb  
General Sessions Court Judge  
Division 1



David L. Pool  
General Sessions Court Judge  
Division 3

9

# OFFICIAL BALLOT

Greater Memphis Democratic Club, Inc.  
**LEADERSHIP • INTEGRITY • COMMITMENT**

**VOTE DEMOCRAT**

**RICKY E.**



# Wilkins




**OUR NEXT CONGRESSMAN**


## DEMOCRATIC LEADERS • VOTER'S GUIDE



**Elect**  
**GORDON BALL**  
United States Senate




**Elect**  
**DEIDRE MALONE**  
County Mayor




**Elect**  
**JUDGE JOE BROWN**  
District Attorney General




**Re-Elect**  
**CHEYENNE JOHNSON**  
Assessor of Property



**Elect**  
**WANDA HALBERT**  
Criminal Court Clerk




**Elect**  
**HENRI E. BROOKS**  
Juvenile Court Clerk



**Elect**  
**COLEMAN THOMPSON**  
County Registrar

## CHANCERY • JUVENILE • GENERAL SESSIONS



**Re-Elect**  
**WALTER EVANS**  
Chancellor Part 1




**Elect**  
**JIM KYLE**  
Chancellor Part 2



**Elect**  
**TARIQ SUGARMON**  
Juvenile Court Judge




**Re-Elect**  
**PHYLLIS GARDNER**  
General Sessions Div. 2



**Re-Elect**  
**LONNIE THOMPSON**  
General Sessions Div. 6

## SHELBY COUNTY SCHOOL BOARD




**Elect**  
**DR. FREDA WILLIAMS**  
School Board Dist. 1



**EXHIBIT**



**Elect**  
**ROSHUN AUSTIN**  
School Board Dist. 9



**Elect**  
**ROSHUN AUSTIN**  
School Board Dist. 9

100044440001